LOVELLS LLP Robin E. Keller, Esq. Matthew P. Morris, Esq. 590 Madison Avenue New York, New York 10022 Telephone: (212) 909-0600 Facsimile: (212) 909-0660

Attorneys for BRE Bank S.A.

## NOTICE OF LIMITED APPEARANCE AND REQUEST FOR SERVICE OF ALL NOTICES, PLEADINGS AND ORDERS

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel to BRE Bank S.A. and certain of its worldwide subsidiaries ("BRE Bank"), a creditor and party-in-interest in the above-captioned Chapter 11 bankruptcy cases, and, pursuant to 11 U.S.C. § 1109(b) and Federal Rules of Bankruptcy Procedure 2002 and 9010, requests that all notices given or required to be given in these bankruptcy cases, and all papers served or required to be served in these bankruptcy cases, be served on BRE Bank by and through service on the following:

Robin E. Keller, Esq. Lovells LLP 590 Madison Avenue New York, NY 10022 Telephone: 212-909-0600

Telephone: 212-909-0600 Facsimile: 212-909-0660

E-mail: robin.keller@lovells.com

. 2 -

**PLEASE TAKE NOTICE** that, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes, but is not limited to, all pleadings, orders, notices, and other papers referred to in any rule of the Federal Rules of Procedure and Local Bankruptcy Rules and additionally includes, without limitation, notices of any application, complaint, demand, hearing, motion, petition, order, pleading or request, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, telephone or otherwise.

PLEASE TAKE NOTICE that the undersigned hereby further requests that the Debtors and their counsel, any duly-constituted committee(s) and their counsel, the United States Trustee, the Clerk of the Court, and all parties filing a notice of appearance herein place the name and address of the undersigned on any mailing matrix to be prepared or existing in the above-referenced bankruptcy cases.

PLEASE TAKE NOTICE that, this Notice of Limited Appearance is not intended to be, and shall not constitute, a consent by BRE Bank to the Bankruptcy Court's subject matter jurisdiction, personal jurisdiction, venue, or core jurisdiction, shall not constitute a waiver of strict service in connection with any adversary proceeding related to these bankruptcy cases, and shall not constitute a waiver of BRE Bank's: (i) right to have final orders in non-core matters entered only after *de novo* review by a District Court judge; (ii) right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (iii) right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which BRE Bank is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments BRE Bank expressly reserves.

Respectfully submitted on this 26th day of November 2008.

By: /s/ Robin E. Keller
Robin E. Keller, Esq.
Lovells LLP
590 Madison Avenue
New York, NY 10022
Telephone: 212-909-0600

Facsimile: 212-909-0660